

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TYHEE HICKMAN, SHANAY BOLDEN, and	:	Civil Action No. 2:17-cv-01038-GAM
O'DONALD HENRY, individually and on	:	
behalf of all persons similarly situated,	:	
	:	<b>Class and Collective Action</b>
<b>Plaintiffs,</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>TL TRANSPORTATION, LLC, SCOTT</b>	:	
<b>FOREMAN, HERSCHEL LOWE,</b>	:	
<b>AMAZON.COM, LLC, and AMAZON</b>	:	
<b>LOGISTICS, INC.,</b>	:	
	:	
<b>Defendants.</b>	:	

**PLAINTIFFS' UNOPPOSED MOTION FOR  
FINAL APPROVAL OF THE SETTLEMENT AGREEMENT**

Plaintiffs Tyhee Hickman, Shanay Bolden, and O'Donald Henry, through their undersigned counsel, respectfully moves this Court for an Order:

1. Granting final approval of the Parties' Settlement Agreement (Dkt. No. 125-2);
2. For settlement purposes, finally certifying the FLSA claims pursuant to 29 U.S.C.

§ 216(b) and the state law claims as a Fed. R. Civ. P. 23 class on behalf of the Settlement Class;

3. Finally approving Plaintiffs Tyhee Hickman, Shanay Bolden and O'Donald Henry as the Representatives of the Settlement Class and approving the service awards for their service to the Settlement Class and in exchange for their additional released claims in favor of Defendants, in the following amounts: \$15,000 to Plaintiff Tyhee Hickman, \$15,000 to Plaintiff Shanay Bolden, and \$2,500 to Plaintiff O'Donald Henry.

4. Finally approving Berger Montague PC and Willig, Williams, & Davidson as Class Counsel for the Settlement Class;

5. Finally approving Class Counsel's attorneys' fees in the amount of \$600,000.00 and costs in the amount not to exceed \$40,000;

6. Finally approving the Angeion Group as Settlement Administrator and finally approving the costs of claims administration not to exceed \$25,000;

7. Finally approving Philadelphia Legal Assistance as the *cy pres* recipient;

8. Dismissing this class and collective action with prejudice.

This Motion is based on the accompanying Memorandum of Law, the Declaration of Sarah Schalman-Bergen in Support of the Plaintiffs' Unopposed Motion for Final Approval of the Settlement Agreement, and all other records, pleadings and papers on file in this action. Pursuant to the terms of the Settlement Agreement, Defendants do not oppose this Motion.

A proposed Final Order is submitted for the Court's consideration.

Dated: February 10, 2020

Respectfully submitted,

s/ Sarah Schalman-Bergen  
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*Attorneys for the Plaintiffs and the Settlement Class*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all counsel of record through the Court's ECF system this 10th day of February, 2020.

s/ Sarah Schalman-Bergen  
Sarah Schalman-Bergen